



The Commonwealth of Massachusetts
DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY

FITCHBURG GAS AND ELECTRIC LIGHT COMPANY
D.T.E. 05-29

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY TO FITCHBURG GAS AND ELECTRIC
LIGHT COMPANY, THE ATTORNEY GENERAL OF THE COMMONWEALTH, THE
ASSOCIATED INDUSTRIES OF MASSACHUSETTS, AND THE LOW-INCOME
WEATHERIZATION AND FUEL ASSISTANCE PROGRAM NETWORK

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Fitchburg Gas and Electric Light Company ("Fitchburg" or "Company"), the Attorney General of the Commonwealth, the Associated Industries of Massachusetts, and the Low-income Weatherization and Fuel Assistance Program Network the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary L. Cottrell, Secretary of the Department and on all parties; also submit one (1) copy of the responses to John J. Geary, Hearing Officer; one (1) copy of the responses to Sean Hanley, Assistant Director, Rates and Revenue Requirements Division; one (1) copy of the responses to Jeff Hall, Analyst, Rates and Revenue Requirements Division; and one (1) copy of the responses to Thomas Carey, Analyst, Rates and Revenue Requirements Division.
8. In addition to filings, all non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.
9. Responses are due on or before Tuesday, April 19, 2005.

INFORMATION REQUESTS

- DTE 1-1 Please refer to Offer of Settlement (“Settlement”) at Section 2.11. Do the Settling Parties contemplate that the costs in excess of the benefits of the pilot program will be recovered in the Company’s next distribution rate case from customers of Fitchburg’s Electric Division only? If so, please discuss how Fitchburg’s Gas Division customers will not be subsidized by the Company’s Electric Division because both electric and gas customers are eligible to participate in the program.